

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	BKRTCY. NO. 19-06674 BKT
HERNANDEZ ONEILL, SAUDDY NOEMI	*	CHAPTER 13
xxx-xx-1670		
LAUREANO COLON, JOAN	*	
xxx-xx-7319		
	*	
<u>DEBTORS</u>		

**DEBTORS' REPLY TO TRUSTEE'S OBJECTION TO PROPOSED
POST CONFIRMATION PLAN MODIFICATION UNDER SECTION 1329
DOCKET NO. 37
AND IN COMPLIANCE WITH ORDER DOCKET NO. 41**

TO THE HONORABLE COURT:

COME NOW, **SAUDDY NOEMI HERNANDEZ ONEILL and JOAN LAUREANO COLON**, the Debtors in the above captioned case, through the undersigned attorney and very respectfully state and pray as follows:

1. On January 08, 2024, Chapter 13 Trustee filed an unfavorable report (Docket No. 37) on the Debtors' proposed post confirmation modified Plan dated 12/21/2023 (Docket No. 33), stating that "...[D]ebtor(s) fails to apply projected disposable income, to be received during the applicable commitment period, to make payments to unsecured creditors under the plan.[1322(a)(1)]." *See: Trustee's Objection to Proposed Post Confirmation Plan Modification Under Section 1329*, Page 1, Docket No. 37.

2. The Debtors respectfully state that on February 02, 2024, the Court entered an *ORDER*, Docket No. 44, granting the Debtors' request for additional time within to reply to the Chapter 13 Trustee's unfavorable recommendation (Docket No. 37).

3. In compliance with this Honorable Court's *ORDER*, Docket No. 44, today, February 05, 2024, the Debtors filed a post confirmation modified Plan, dated 02/05/2024, and also hereby submit their reply to the Chapter 13 Trustee's unfavorable recommendation (Docket No. 37). The Debtors respectfully state that the February 05, 2024 post confirmation modified Plan cures the objections raised by the Chapter 13 Trustee in his unfavorable recommendation (Docket No. 37), in the above captioned case.

WHEREFORE the Debtors respectfully pray that this Honorable Court deny the Trustee's unfavorable recommendation (Docket No. 37), granting the *Debtors' Motion for Post Confirmation Modified Plan under Section 1329*, Dated February 05, 2024, thus,

approving the Debtors' post confirmation modified Plan dated 02/05/2024, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee Jose Ramon Carrion Morales, Esq.; and I also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participants: the Debtors, Sauddy N. Hernandez O'Neill and Joan Laureano Colon, RR6 Box 6936 Toa Alta PR 00953, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of February, 2024.

*/s/ **Roberto Figueroa Carrasquillo***
USDC #203614
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